### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

KATELYN HANKS,

PLAINTIFF,

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VS.

CIVIL ACTION NO 3:18-CV-02711-N

PALETAS POP, LLC and GOOD SPACE X, LLC

DEFENDANTS.

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DEFENDANTS.

# UNOPPOSED MOTION OF DEFENDANTS GOOD SPACE X, LLC AND PALETAS POP, LLC TO EXTEND RESPONSIVE PLEADING DEADLINE

COME NOW, GOOD SPACE X, LLC and PALETAS POP, LLC, Defendants in the above entitled and numbered cause ("Defendants"), and move the Court for a second extension of the deadline for Defendants to file their response to Plaintiff's Complaint, and in support therefore Defendants respectfully state as follows:

I.

Plaintiff and Defendants are currently engaged in settlement negotiations and the Parties appear to be making meaningful progress in their negotiations to resolve this case.

II.

Defendants previously requested, and the Court previously granted, a thirty (30) day extension for Defendants to Answer or otherwise respond to Plaintiff's Complaint. Defendants' Answers or other responses to Plaintiff's Complaint are currently due to be filed by Wednesday,

December 19, 2018. The Parties have made very productive use of the first thirty (30) day extension period but need additional time to advance their negotiations.

In light of the current posture of the Parties' settlement negotiations, Plaintiff's counsel has advised that he is amenable to extending the Defendants' Answer Deadline for another thirty (30) days or until January 18, 2019.

IV.

Defendants respectfully move the Court to grant this Unopposed Motion to further extend Defendants' deadline to file an Answer or otherwise respond to Plaintiff's Complaint for a period of thirty (30) days or up to and including January 18, 2019.

As stated above, Counsel for the Plaintiff has no objection and in fact has agreed to the extension requested by Defendants.

V.

For good cause, and in accordance with Fed.R.Civ.P. 6, Defendants file this Unopposed Motion to Extend Defendants' Answer Date for a period of thirty (30) days. Good cause exists for the requested extension in that Defendants and Plaintiff are engaged in substantive settlement negotiations and require additional time to work towards a settlement of this dispute.

No party will be prejudiced by the requested extension and all parties, including Plaintiff, have consented to the requested extension.

WHEREFORE, PREMISES CONSIDERED, Defendants GOOD SPACE X, LLC and PALETAS POPL, LLC respectfully request that the Court extend the deadline for Defendants to answer or otherwise respond to Plaintiff's Complaint up to and including January 18, 2019.

Respectfully submitted,

#### MUSGROVE LAW FIRM, P.C.

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## ATTORNEYS FOR DEFENDANT PALETAS POP, LLC

#### **CERTIFICATE OF CONFERENCE**

This is to certify that Counsel for Defendant Good Space, LLC has conferred with Douglas Schapiro, Attorney-in-Charge for Plaintiff and Stuart Reynolds, Counsel for Defendant Paletas Pop, LLC, and all Parties have agreed to the extension requested in this Unopposed Motion.

/s/ Cami L. Boyd\_

#### **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing motion was served upon all parties of record through their counsel on December 12, 2018 via the Court's ECF filing system and via electronic mail.

/s/ Cami L. Boyd